

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JOHN MICHAEL MOLINARES,

Plaintiff,

CASE NO. 1:07-CV-413

v.

HON. ROBERT J. JONKER

IONIA COUNTY, ANTHONY LIMON, JR., JOE
MARSDEN, CATHY JO ROSS, and DWAIN DENNIS,
individually and in their official capacities,

Defendants.

STIPULATED PROTECTIVE ORDER

Based on the stipulation of the parties and for good cause shown under FED. R. CIV. P. 26(1), **IT IS ORDERED** that certain documents requested by the Plaintiff in this lawsuit, those specifically being personnel files of the individually-named Defendants, shall be produced by Defendant Ionia County subject to the following conditions:

1. Prior to the disclosure, the Social Security numbers, addresses and telephone numbers of the individual employees, their medical conditions, if any, the names of their immediate family members, and the names and addresses of those that have been provided as personal references, may be properly deleted or redacted from the files produced.
2. The documents subject to this protective order shall be designated as being “confidential” by the disclosing party and shall be used solely and exclusively for purposes of prosecution or defense of the instant lawsuit, and to that end, can be used in any and all court filings, judicial proceedings, depositions, alternative dispute resolution proceedings, trial, and any other judicially-related proceedings.

3. The documents subject to this protective order shall not be used in or for any other case, proceeding, dispute, or for any commercial, business, or competitive purpose whatsoever.
4. The documents subject to this protective order may be reviewed by Counsel for the parties, the named parties, Counsels' staff, those individuals associated with the activities cited in subparagraph (2), and such experts and consultants as Counsel deems necessary for purposes of this litigation and that are identified on witness lists.
5. The documents provided under this protective order may be disclosed only to those individuals and entities identified or referred to in this protective order and must be used only by those individuals and entities for purposes of this litigation.

IT IS FURTHER ORDERED that nothing in this protective order shall prevent a party from filing a Motion for Modification of the Protective Order.

IT IS FURTHER ORDERED that this protective order shall survive and remain in full force and effect until the entry of final judgment (including any appellate proceedings) in this case, whether by settlement or litigation, unless otherwise ordered by the Court.

IT IS FURTHER ORDERED that the documents produced under this protective order do not constitute an admission or agreement that any such document is admissible as evidence in this case. Determinations or evidence admissibility will be made by the Court in a separate proceeding.

IT IS FURTHER ORDERED that the documents produced under this protective order shall be destroyed by Plaintiff's Counsel after final disposition (including all appeals) of the case.

Dated: June 25, 2008

/s/ Robert J. Jonker
ROBERT J. JONKER
UNITED STATES DISTRICT JUDGE